

OCT 04 1989

Docket No. 50-293

Boston Edison Company
ATTN: Mr. Ralph G. Bird
Senior Vice President - Nuclear
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Gentlemen:

Subject: Response to Request for Confirmation of Generic Letter No. 82-12,
Nuclear Power Plant Staff Working Hours

This letter responds to your July 20, 1989 request for confirmation that Generic Letter 82-12 is applicable to Pilgrim Nuclear Power Station (PNPS), applies to staff performing safety related functions, and applies during outage periods. It is clear to the staff that NRC guidelines are fully applicable to the performance of safety related functions during operation and during shut-down periods. Both the generic letter and NRC Inspection Report 50-293/88-07 (dated May 6, 1988) are explicit on this matter, and, in fact, overtime control during outages was precisely the issue of NRC concern in Inspection 88-07. An enclosure to this letter provides additional detail.

NRC will continue to hold BECo accountable for controlling overtime to ensure that personnel are not assigned to any safety related duties while in a fatigued condition.

Sincerely,

Original Signed By:

Samuel J. Collins, Deputy Director
Division of Reactor Projects

Enclosure: Comments on Applicability of NRC Overtime Limits

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cc w/encl:

K. Highfill, Station Director
 R. Anderson, Plant Manager
 J. Keyes, Licensing Division Manager
 E. Robinson, Nuclear Information Manager
 R. Swanson, Nuclear Engineering Department Manager
 The Honorable Edward J. Markey
 The Honorable Edward P. Kirby
 The Honorable Peter V. Forman
 The Honorable Lawrence R. Alexander
 The Honorable Nicholas J. Costello
 B. McIntyre, Chairman, Department of Public Utilities
 Chairman, Plymouth Board of Selectmen
 Chairman, Duxbury Board of Selectmen
 Plymouth Civil Defense Director
 P. Agnes, Assistant Secretary of Public Safety, Commonwealth of Massachusetts
 S. Pollard, Massachusetts Secretary of Energy Resources
 R. Dymshak, MASSPIRG
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bcc w/encl:

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 R. Blough, DRP
 C. Carpenter, RI - Pilgrim (with concurrences)
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RI:DRPBlough/meo
9/7/89B
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a/s

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09/07/89B
RI:DRPCollins
diagram

OGC

DRP

D/RA

for Kane

R. Hoefling

OGC

per telcom 9/26/89

(FIS 492-1630)

ENCLOSURE

COMMENTS ON APPLICABILITY OF NRC OVERTIME LIMITS

NRC overtime guidelines are applicable to all licensees and are intended to ensure that workers are not assigned to safety related duties while in a fatigued condition. The NRC intends that licensees will provide adequate staff to minimize overtime during both periods of operation and outages. The NRC expects licensees to exercise judicious control of overtime by setting numerical guideline limits and that cases involving deviation from these overtime guidelines would be evaluated and pre-approved, case-by-case, based on the merits of the situation. The following excerpt of NRC Generic Letter 82-12, dated June 15, 1982, illustrates the fact that NRC recognizes that overtime may be used more extensively during outages than during routine operations, but that the NRC still expects licensees to minimize overtime and to exercise positive control:

"Enough plant operating personnel should be employed to maintain adequate shift coverage without routine heavy use of overtime. The objective is to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:..." (The letter then goes on to list numerical guidelines.)

NRC Generic Letter 83-14, March 7, 1983, provides clarification to ensure that licensees will apply the guidelines to all those plant staff who perform safety related functions. NRC Region I Inspection Report 50-293/88-07, May 6, 1988, described NRC inspection efforts during an extended outage and states, in part:

"from a review of the payroll records and a brief review of the later-provided security computer records, it was apparent that some of the same individuals were working overtime for several weeks in succession. The lack of pre-approval at the senior plant management level, as well as the prolonged approval of hours for maintenance personnel in excess of the NRC guidelines is not consistent with the intent of the NRC guidelines which discuss exceeding the guidelines only in unusual circumstances."